

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

Jointly Administered

Ref. Nos. 21544 & 21633

**NOTICE OF CONTINUED DEPOSITION OF W.R. GRACE & CO., ET AL.
PURUSANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the claimants injured by exposure to asbestos from the Debtors' operations in Lincoln County, Montana (the "Libby Claimants"),¹ through their undersigned counsel, will take the continued deposition of **W.R. Grace & Co., et al.** (the "Debtors").² By agreement, the deposition will continue on **June 5, 2009** and **June 11, 2009**, beginning at **9:30 a.m.**, at Kirkland & Ellis LLP, 655 15th Street N.W., Suite 1200, Washington, DC 20005, or on such other date and at such other location as mutually agreed by the Libby Claimants and the Debtors.³ The deposition will continue from day to day until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by audio, video and/or stenographic means. You are hereby invited to attend and examine the witness.

Pursuant to Rule 30(b)(6), the Debtors shall designate one or more officers, directors, managing agents, or other persons who consent to testify on their behalf as to all facts and other

¹ As identified in the Amended and Restated Verified Statement of Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP Pursuant to Fed. R. Bankr. P. 2019 [D.I. 21365], as it may be amended and restated from time to time.

² The initial day of the deposition was held on May 13, 2009, when the Debtors produced Richard Finke, Esq.

³ The Debtors have indicated that they will produce Hudson LaForce on June 5, 2009 and Jay Hughes, Esq. on June 11, 2009.

information known or reasonably available to the Debtors relating to the matters set forth in Attachment A. For each person designated to testify as to any matters set forth in Attachment A, the Debtors are requested to produce at the deposition all documents which the person has reviewed in preparing to testify with respect to the matters as to which the person is designated to testify, and, unless already made available in discovery, all other documents relating to the matters set forth in Attachment A.

Dated: May 27, 2009
Wilmington, Delaware

LANDIS RATH & COBB LLP



Adam G. Landis (No. 3407)
Rebecca L. Butcher (No. 3816)
Kerri K. Mumford (No. 4186)
919 Market Street, Suite 1800
Wilmington, DE 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450

- and -

Daniel C. Cohn
Christopher M. Candon
COHN WHITESELL & GOLDBERG LLP
101 Arch Street
Boston, MA 02110
Telephone: (617) 951-2505
Facsimile: (617) 951-0679

Counsel for Libby Claimants